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7 *Attorneys for Defendants*
Mackenzie Bennington and Whitney Bennington

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 ADAM HAWTHORNE,

12 Plaintiff,

13 v.

14 MACKENZIE BENNINGTON, et al.,

15 Defendant.

Case No. 3:16-cv-00235-RCJ-CLB

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO FILE REPLY
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT
(First Request)**

16 Defendants, Mackenzie Bennington and Whitney Bennington, by and through
17 counsel Aaron D. Ford, Attorney General of the State of Nevada, and Rost C. Olsen, Deputy
18 Attorney General, move this Court for a short 14-day extension of time to file a reply in
19 support of their Motion for Summary Judgment (ECF No. 101).

20 Federal Rule of Civil Procedure 6(b)(1)(A) permits the Court to extend a deadline
21 before its expiration, either upon a motion or *sua sponte*, upon a showing of good cause.

22 Here, the notice of electronic service accompanying Plaintiff's Opposition to the
23 Motion for Summary Judgment (ECF No. 113) indicates reply briefs are due April 22, 2021.
24 However, the Undersigned is in the midst of preparing for multi-day jury trial beginning
25 April 20, 2021, and anticipates it continuing until at least April 23, 2021. *See, generally,*
26 Decl. of Counsel.

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1 Accordingly, Undersigned submits there is good cause for an extension, and
2 respectfully requests the reply brief deadline be extended until **Thursday, May 6, 2021**.
3 Defendants seek this extension in good faith and not to cause any undue delay or any other
4 improper purpose.

5 DATED this 12th day of April, 2021.

6 AARON D. FORD
7 Attorney General


8 By:


9 ROST C. OLSEN, Bar No. 14410
10 Deputy Attorney General

11 *Attorneys for Defendant*

12 IT IS SO ORDERED.

13 Dated: April 13, 2021

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15 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 12th day of April, 2021, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT (First Request)**, by U.S. District Court CM/CEF Electronic Filing on:

Adam Hawthorne, #67761
C/O NNCC Law Librarian
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Carson City, NV 89702
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An employee of the
Office of the Attorney General

EXHIBIT A

Declaration of Counsel

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15 Defendant.

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DECLARATION OF COUNSEL

16 I, Rost C. Olsen, declare the following:

17 1. I am an attorney licensed to practice in the State of Nevada, and am admitted
18 to the bar of the United States District Court for the District of Nevada;

19 2. I am employed as a Deputy Attorney General with the Office of the Nevada
20 Attorney General, and am the counsel of record for the Defendants in the above-captioned
21 matter;

22 3. I am over the age of 18, and am otherwise fully competent to testify to the
23 facts contained in this declaration;

24 4. The statements contained in this declaration, except where otherwise
25 indicated to be upon information and belief, are based on my personal knowledge;

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